

jim elliott

From: Stevens - Strom [cloie2@bresnan.net]
Sent: Monday, March 19, 2007 7:41 PM
To: jim@jimelliott.org
Cc: larchwood@blackfoot.net
Subject: SB479-The Huck Bill

I am writing to you in support of SB 479, at the request of Marla Hedman, Larchwood Farms. I support it for 2 principal reasons.

1) Several years ago (before I retired) while I was manager for the Montana Food, Drug & Cosmetics Program I spoke with Marla Hedman of Larchwood Farms, with Ray Brandewie of Mission Hill Preserves Factory, and a couple of other reliable processors of Wild Montana Huckleberries, concerning the issues raised in this bill. It seems that the relatively high per pound price of wild huckleberries had induced several "packers" to buy cheaper berries from Oregon, British Columbia, & Washington etc., which still were touted as "huckleberries", but which were lacking the rich and distinctive flavor of the Wild Montana Hucks. This created a severely distorted playing field for the packers of the true Montana Huckleberries, and placed them in a difficult financial position as food processors. They were being undercut in price by an inferior product which carried the same name-Huckleberry Preserves. If this bill is enacted, then under Montana's Food, Drug & Cosmetics Act such a product should be regarded as "misbranded", and subject to seizure in the marketplace.

Clearly, wild berry preserves manufacturing is an industry which Montana needs and it would be regrettable if they were squeezed out of the market by cheaper less flavorful berries. I conducted Microscopic examination of several products at the time that Ms Hedman raised this issue. This work clearly showed that some processors (including Larchwood and Mission Hill) were using native huckleberries exclusively, while at least 2 other processors' products contained berries which were pulpier and had larger seeds, easily differentiated from local berries of the species *Vaccinium membranaceum* or *V.globulare* when viewed under a microscope.

2) In my many years reviewing and inspecting processing plants and food products, I came to understand that consumers expect "truth" in labeling, and that Montana consumers assumed that all "huckleberries" are the same. As you are no doubt aware, this is not the case. I believe it is possible for people to be allergic to one variety of blueberries or huckleberries, and not be allergic to another. Therefore the labeling of huckleberry products should not group all types of blueberries and huckleberries as meeting the same standard of identity.

Incidentally, many berries conforming to the definition in this bill are grown in Canada, especially western Alberta and British Columbia, and many are exported to Montana and other parts of the U.S. There are also flavoring products which are labeled "Huckleberry Flavoring or Extract" which are made from berries other than the true wild Montana Huckleberry.

I hope that the bill will be enacted and that adequate provision for enforcement is to be included. Please feel free to contact me if I can be of further assistance.

Sincerely,

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Food Safety and Technology Consultant
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*Formerly Program Manager,
Food & Drug Program, Montana DPHHS*